

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
LASPATA DECARO STUDIO CORP.,

Plaintiff,

-against-

RIMOWA GMBH, RIMOWA DISTRIBUTION
INC., AND RIMOWA INC., MEIRÉ GMBH & CO.
KG, d/b/a MEIRÉ AND MEIRÉ, and SHOTVIEW
BERLIN PHOTOGRAPHERS MANAGEMENT
GMBH, d/b/a SHOTVIEW ARTISTS
MANAGEMENT,

Defendants.
-----X

Case No. 16 Civ. 934 (LGS)(KNF)

**DECLARATION OF LILY LANDSMAN-ROOS IN SUPPORT OF
LASPATA DECARO STUDIO CORPORATION'S MOTION TO COMPEL**

I, Lily Landsman-Roos, declare under penalty of perjury that the following is true and correct:

1. I am an attorney at Frankfurt Kurnit Klein & Selz P.C., counsel to plaintiff Laspata Decaro Studio Corporation ("LD") in this action. I submit this declaration in support of LD's motion to compel pursuant to Rule 37 of the Federal Rules of Civil Procedure.

2. Attached hereto as **Exhibit A** is a true and correct copy of a June 13, 2012 article from *Women's Wear Daily*, produced by defendants Rimowa GmbH, Rimowa Distribution Inc., and Rimowa Inc. ("Rimowa") bearing bates number RIM00000974.

3. Attached hereto as **Exhibit B** is a true and correct copy of the same June 13, 2012 article from *Women's Wear Daily*, and the gallery of eight photographs contained therein. This version of the article, which is more legible than Exhibit A, is available at

<http://wwd.com/business-news/media/americanas-silent-fall-5959079/>.

4. Attached hereto as **Exhibit C** is a true and correct copy of excerpts from the transcript of the deposition of Michael Meiré, the Rule 30(b)(6) designee for defendant Meiré GmbH & Co. KG (d/b/a Meiré and Meiré) (“Meiré”), taken on August 10, 2017.

5. Attached hereto as **Exhibit D** is a true and correct copy of a document produced by Rimowa bearing bates number RIM00000103.

6. Attached hereto as **Exhibit E** is a true and correct copy of Rimowa’s behind-the-scenes video, produced by LD bearing Bates number LD-00004247.

7. Attached hereto as **Exhibit F** is a true and correct copy of screenshots from Rimowa’s behind-the-scenes video.

8. Attached hereto as **Exhibit G** is a true and correct copy of a side-by-side comparison of the Infringing Photographs and the LD Photographs.¹

9. Attached hereto as **Exhibit H** is a true and correct copy of excerpts from the transcript of the deposition of Birgit Wengers, Rimowa’s Rule 30(b)(6) designee, taken on August 3, 2017.

10. Attached hereto as **Exhibit I** is a true and correct copy of Plaintiff’s First Requests for the Production of Documents, dated April 28, 2016.

11. Attached hereto as **Exhibit J** is a true and correct copy of Rimowa’s 2015/2016 Lookbook *The Journey*, produced by Meiré bearing bates number MEIRE00009038.

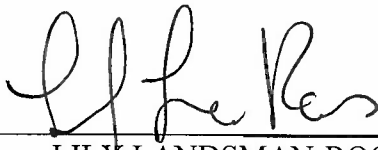
12. Attached hereto as **Exhibit K** is a true and correct copy of a document produced by Rimowa bearing bates number RIM00000608.

13. Attached hereto as **Exhibit L** is a true and correct copy of a document produced by Rimowa bearing bates number RIM00002373.

¹ These defined terms have the same meaning as given to them in Plaintiff’s Memorandum of Law.

14. Attached hereto as **Exhibit M** is a true and correct copy of an email received from Rimowa's counsel on August 15, 2017.

Dated: New York, New York
August 29, 2017



LILY LANDSMAN-ROOS